



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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May 2, 2012

Mr. Jon Braden  
McGrath Steel Company  
Address Unknown

Shirley J Davini & Dorothy D McGuire  
123 Estudillo Avenue  
San Leandro, CA 94577

Mr. Walter Merkle  
MCG Investments LLC  
123 Estudillo Avenue  
San Leandro, CA 94577

Subject: Request for Work Plan Addendum; Fuel Leak Case No. RO0000063; (Global ID # T0600102099); McGrath Steel Company, 6655 Hollis Street, Emeryville, CA 94608

Dear Ms. Davini, Ms. McGuire, and Mr. Merkle:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the *Additional Site Characterization and Interim Remedial Action Workplan*, dated September 27, 2011 (received December 1, 2011). The work plan was prepared and submitted on your behalf by AllWest Environmental, Inc. (AllWest). Thank you for submitting the work plan; it helps move the site forward. In addition to free-phase product (FPP) removal, well redevelopment, and well sampling, the work plan proposes the installation of five direct push bores to delineate the downgradient extent of dissolved-phased hydrocarbons. It includes three contingency locations due to proposed installation of two primary locations on property owned by parties not involved in this case. One primary location (B-15) and two alternate locations (B-18 and B-19, alternate location 1) are at locations similar to previously installed bores, and appear intended to collect current updated soil and groundwater analytical data to help establish contaminant trends in the intervening years. During a site visit in September 2011, up to three feet of free-phase product (FPP) was measured in well MW-3, the only well associated with the site. Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

#### **TECHNICAL COMMENTS**

- 1) Request for Work Plan Addendum** – The referenced work plan proposes a series of downgradient delineation actions with which ACEH is in general agreement; however, ACEH requests a work plan addendum to incorporate existing outstanding requests, and to fill existing data gaps. As proposed at present, the closest soil bore location is approximately 60 feet from the former UST location and from well MW-3 (with up to three feet of FPP). The next closest soil bore location is approximately 110 feet distance from the former UST location. Soil bores at these distances will not provide adequate delineation of the extent FPP, at a minimum. In an April 7, 2006 directive letter ACEH expressed a concern that the groundwater plume may have migrated beneath the existing warehouses but did not specify if the warehouses of concern were on the north or south side of 67<sup>th</sup> Street. Because warehouses on both sides of the street are of concern, this concern cannot be addressed with the proposed soil bore locations. Additionally in the April 2006 directive letter, ACEH also requested the determination of the groundwater gradient in the site vicinity. These requests, outstanding since that time, require the installation of additional source area soil bores and a minimum of two additional wells. The location of the two wells is best decided after installation of the soil bores and incorporation of that data into the well location selection process. This can be done with a data submittal (tabulated soil and groundwater data, appropriate figures to depict the data, and completed

soil bore logs) in consultation with ACEH. Tabulated data is specifically requested to include all previous (historic) analytical data.

When proposing additional soil bore and well locations, please be aware of known utility locations and depths. Because the sewer and water services are reported to be buried at a depth of approximately 8 feet below grade surface (bgs), and groundwater can be as shallow as 7 feet bgs, the soil bore locations can yield insight as to potential preferential pathways in the site and vicinity. By the date identified below, ACEH requests the submittal of a work plan addendum.

- a. Request for Source Area Characterization** – In order to adequately delineate FPP and to determine the potential for the migration of the plume (FPP or dissolved-phase) beneath the warehouses on the south side of 67<sup>th</sup> Street, ACEH requests adequate source area characterization with the installation of additional soil bores. The installation of a bore into the old UST excavation may be appropriate.
- b. Request for Downgradient Bore Transect** - For the purpose of delineating the lateral and downgradient extent of the groundwater plume ACEH is in general agreement with the locations of the proposed soil bores in the site vicinity; however, requests relocation of soil bore B-19, and Alternate 2, such that a soil bore transect is installed along 67<sup>th</sup> Street, to tightly constrain the location of the downgradient dissolved-phase groundwater plume. Further bores may be appropriate to fill gaps in the proposed bore locations on the north side of 67<sup>th</sup> Street in order to provide quick and tight plume delineation. This will allow for a quick assessment of the plume location and can allow for focused remedial efforts, as needed.
- c. Clarification of Analytical Suite for Soil and Groundwater** – To prevent miscommunication, ACEH requests the following analytical suite for the soil and groundwater investigation (Additional analytical requirements for waste characterization were identified in the work plan, and are largely driven by disposal facility disposal requirements; ACEH does not seek modification of those requirements). Specifically, for source area characterization, ACEH requests that all soil and groundwater media be submitted for analysis for TPHg, TPHd, TPHms, BTEX, and all fuel oxygenates (MTBE, TAME, TBA, DIPE, ETBE) and lead scavengers (EDB & EDC). Use of silica gel cleanup for extractable range hydrocarbons (TPHd and TPHms) was proposed and would be appropriate. For downgradient delineation bores fuel oxygenates and lead scavengers can be eliminated for soil. A full scan VOCs analysis was also proposed for grab groundwater samples, and is appropriate, at least initially, at the site due to past historical uses of chemicals in the site vicinity (Clearprint Paper Co and potentially others). The work plan included several references to TPHmo analysis. ACEH is not sure of a reason to include this analysis; however, with clarification may be amenable to inclusion of the analyte in the analytical suite. It would also be useful to fingerprint the FPP, reported to be clear, an unusual condition more than a decade after its presumed release.
- d. Soil Selection Protocols** – The work plan addendum proposes to collect approximately two soil samples in each soil bore at a static depth interval (5 and 10 feet below grade surface). To preclude miscommunication ACEH additionally requests that soil samples be collected, and submitted for analysis, at signs of contamination (odor, discoloration, PID responses, etc.) and at significant changes in lithology. Please be aware to submit sufficient soil samples to define the vertical extent of associated contamination, an ACEH request.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Mark Detterman), according to the following schedule:

- **June 15, 2012** – Work Plan Addendum
- **60 Days After Work Plan Approval** – Soil and Groundwater Report (SWI)

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These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Leonard Niles, AllWest Environmental, Inc, 530 Howard Street, Suite 300, San Francisco, CA 94105; (sent via electronic mail to: [leonard@allwest1.com](mailto:leonard@allwest1.com))

Donna Drogos, ACEH, (sent via electronic mail to [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Mark Detterman, ACEH, (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Geotracker, Electronic File

# Attachment 1

## Responsible Party(ies) Legal Requirements/Obligations

### REPORT REQUESTS

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

### AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

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|---|--|
| <b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b> | <b>REVISION DATE:</b> July 20, 2010  |
|   | <b>ISSUE DATE:</b> July 5, 2005  |
|   | <b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010 |
| <b>SECTION:</b> Miscellaneous Administrative Topics & Procedures              | <b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions                                  |

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

## REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

## Submission Instructions

- 1) Obtain User Name and Password
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)
  - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.